

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE

AARON SIEGEL, JASON COOK,
JOSEPH DELUCA, NICOLE CUOZZO,
TIMOTHY VARGA, CHRISTOPHER
STAMOS, KIM HENRY, AND
ASSOCIATION OF NEW JERSEY
RIFLE AND PISTOL CLUBS, INC.,

Plaintiffs,

v.

MATTHEW J. PLATKIN, in his official
capacity as Attorney General of the State
of New Jersey; and PATRICK
CALLAHAN, in his official capacity as
Superintendent of the New Jersey State
Police,

Defendants.

No. 22-CV-7463 (RMB) (AMD)

RONALD KOONS; NICHOLAS
GAUDIO; JEFFREY M. MULLER;
SECOND AMENDMENT
FOUNDATION; FIREARMS POLICY
COALITION, INC.; COALITION OF
NEW JERSEY FIREARM OWNERS; and
NEW JERSEY SECOND AMENDMENT
SOCIETY,
Plaintiffs,

v.

WILLIAM REYNOLDS in his official
capacity as the Prosecutor of Atlantic
County, New Jersey; GRACE C.

No. 22-CV-7463 (RMB) (AMD)

MACAULAY in her official capacity as the Prosecutor of Camden County, New Jersey; ANNEMARIE TAGGART in her official capacity as the Prosecutor of Sussex County, New Jersey; MATTHEW J. PLATKIN, in his official capacity as Attorney General of the State of New Jersey; and PATRICK CALLAHAN, in his official capacity as Superintendent of the New Jersey State Police,
Defendants.

CERTIFICATION OF STEVEN GORELICK

I, Steven Gorelick, with offices located at 153 Halsey Street, Newark, NJ 07102, do hereby provide the following Certification.

1. I currently serve as the Executive Director of the New Jersey Motion Picture and Television Development Commission.
2. In my capacity as Executive Director, I am thoroughly familiar with the activities of the Commission with regard to assisting motion picture or television companies seeking to film at locations within the State of New Jersey.
3. I specifically provide this Certification with regard to Section 7.a (23) of Chapter 131 of the Laws of 2022 which designates as a place where the carrying of a firearm or destructive device is prohibited “a public location being used for making motion picture or television images for theatrical, commercial or educational purposes, during the time such location is being used for that purpose.”

4. I am providing this Certification for the edification of the Court because movie sets are generally closed to the public. Not only would someone carrying a functional firearm or destructive device be prohibited from a motion picture or television location set, but the same would generally apply to a person without a weapon or destructive device.

5. Production of motion pictures and television programs has become a burgeoning industry in New Jersey. New Jersey is attractive because it has a wide variety of locations within a small geographic area, making shooting on location in New Jersey efficient and cost effective.

6. Our office assists producers, directors, and location managers with regard to the procurement of desired locations and offer them assistance in negotiating the use of public and private properties.

7. Permits are generally required for filming at such locations as county, state and national parks and historic sites, state and county highways, railroad and airport terminals and military posts. <https://www.nj.gov/state/njfilm/regulations-firearms.shtml>. Our office will assist production companies in obtaining these permits.

8. The use of private properties is obtained by contractual agreement between the production company and the property owner, and where necessary

and/or applicable, our office will assist production companies in working with local police to provide security.

9. With regard to public properties such as streets, roads or parks, our office plays an active role in obtaining assistance from local governing bodies to close off these locations from public access and provide security with local police supplemented by other security guards and other employees of the production company.

10. In some cases, the individual talent (i.e., actors, actresses), will have personal security guards when there is the problem of stalkers or overly aggressive fans that are to be kept outside of the location.

11. Typically, a location involves a significant amount of expensive equipment, many trucks and other vehicles, and the many employees involved in the production, sometimes exceeding 100 persons.

12. Therefore, access to these locations is typically restricted and controlled.

13. Our experience over the past three years during the covid pandemic is instructive with regard to the security of location sets. During the time of the health emergency, all persons permitted on the sets of union productions and even many non-union productions had to produce negative covid tests. This even

applied to official visits. The point is that location set security is applied scrupulously without discrimination.

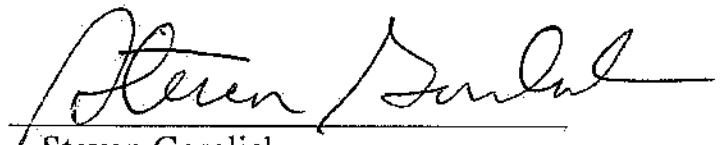
I hereby certify that all of the statements made in this Certification by me are true.

New Jersey Motion Picture and Television
Development Commission

Date: _____

2/13/23

By: _____



Steven Gorelick
Executive Director